

Appendix 1

Fact discovery

1. Document production will be on a rolling basis, and shall be substantially completed by Friday, August 12, 2022.
2. The parties shall exchange privilege and redaction logs by Friday, August 19, 2022 with respect to any documents withheld from production, and shall be updated as needed thereafter.
3. All fact discovery shall be completed by Friday, February 17, 2023, with the exception of any non-expert discovery motions not yet ruled on. Any non-expert discovery motion must be filed at least 30 days before the close of fact discovery, unless otherwise ordered by the Court.

Class Certification

4. The deadline to add parties or amend pleadings shall be Friday, October 7, 2022.
5. Plaintiffs shall move for class certification, and serve supporting fact and expert evidence, by no later than Monday, March 28, 2022.
6. Defendants are to complete taking class certification discovery¹ of Plaintiffs by Thursday, April 28, 2022.
7. Defendants shall file any opposition to class certification, and serve supporting fact and expert evidence, by Friday, May 13, 2022.
8. Plaintiffs are to complete taking class certification discovery of Defendants by Friday, July 1, 2022.
9. The deadline for Plaintiffs to file a reply in further support of class certification shall be Tuesday, July 12, 2022.

Non-Class Certification Expert Discovery

10. The deadline for Plaintiffs to serve opening expert reports on non-class certification issues is Tuesday, March 14, 2023.
11. The deadline for Defendants to serve rebuttal expert reports on non-class certification issues shall be Monday, May 1, 2023.
12. The deadline to serve reply expert reports on non-class certification issues shall be Monday, May 22, 2023.

¹ The parties do not mean to imply that discovery in this action should be bifurcated between “class certification” and “merits” discovery.

13. All expert discovery shall be completed by Tuesday, June 20, 2023.

Dispositive Filings

14. The parties shall file summary judgment/dispositive motions by Friday, July 7, 2023.
15. The parties shall file oppositions to summary judgment motions by Friday, August 25, 2023.
16. The parties shall file replies to any motions for summary judgment by Friday, September 22, 2023.